

## **EXHIBIT D**



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October 16, 2020

**VIA EMAIL (MGRIFIN1705@GMAIL.COM)**

Mathew Griffin  
1705 Morris Court  
North Wales, PA 19545

**Re: Polysciences, Inc. v. Joseph T. Masrud, Civil Action No. 2:20-cv-03649-PBT**

Dear Mr. Griffin:

We write in response to your letter dated October 13, 2020. As we have discussed, we take issue with several of your positions, some of which you repeated in your letter. While reserving all rights, we think the most productive course of action right now is to address the most crucial items.

As a preliminary matter, we understand and appreciate your concern regarding Greene Tweed's documents and confidential information. Per our understanding, Greene Tweed is not a competitor of Polysciences, but to move this matter forward, we would be willing to join you on a call with Greene Tweed's counsel to address any concerns they may have as we have no interest in in *any* of Greene Tweed's information.

We are only interested in documents or things relating to Polysciences. Ideally, a proper forensic analysis would not identify any of Greene Tweed's information, and we can discuss steps to make sure that is the case. However, to the extent there may be overlap due to the use of certain search terms, we can represent to you that we will (1) treat all information as confidential; (2) quickly return any information of Greene Tweed that is inadvertently produced; and (3) permanently destroy all copies of same. This should adequately resolve any reservations you may have regarding Greene Tweed's information contained on your personal computer.

We also note that we have been keeping Ms. Peck, who is counsel to both Mr. Masrud and Serochem, apprised of all of our communications (and she is even copied on this letter). Information produced relating to Serochem is encompassed by the subject matter of this lawsuit,

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and is therefore subject to the protective order agreed to by the parties involved. Documents and information relating to Serochem are responsive to Polysciences' document requests and directly relate to the claims Polysciences asserts in its Complaint. Polysciences is entitled to receive these documents subject to the protective order. Your suggestions that Polysciences identify for you particular file names that you may possess, and similar approaches that require Polysciences to first identify what you might have, are not sufficient compliance under Rule 45 (see subpoena) and the facts and circumstances of this case. Therefore, we again request that you provide all relevant, non-privileged documents and things related to Serochem and Polysciences as requested in our Subpoena.

I also reiterate that Polysciences will not subsidize your engagement of your former counsel or new counsel. As discussed, we are aware of no basis in the Rules of Civil Procedure or elsewhere for such a demand.

We are available to discuss these issues by phone should you wish to do so. If, however, we cannot reach an agreement by the close of business on Tuesday, October 20, 2020, Polysciences will have no choice but to file a motion with the Court to compel production from you of the responsive documents and files requested in the subpoena.

Sincerely yours,

Eric E. Reed

cc: Julianne Peck, Esq.